

containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution and Possession with Intent to Distribute Methamphetamine)

On or about February 13, 2020, in the Eastern District of Louisiana, the defendant, [REDACTED] did knowingly and intentionally distribute and possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute Methamphetamine)

On or about March 20, 2020, in the Eastern District of Louisiana, the defendants, JOANNA MANZANO [REDACTED] did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Attempted Distribution of Methamphetamine)

On or about March 20, 2020, in the Eastern District of Louisiana, the defendant, [REDACTED] did knowingly and intentionally attempt to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 5
(Attempted Distribution of Methamphetamine)

On or about March 5, 2021, in the Eastern District of Louisiana, the defendant, [REDACTED] did knowingly and intentionally attempt to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 5 of this Superseding Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States

2. As a result of the offenses alleged in Counts 1 through 5, the defendants, JOANNA MANZANO, [REDACTED] shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offenses, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses.

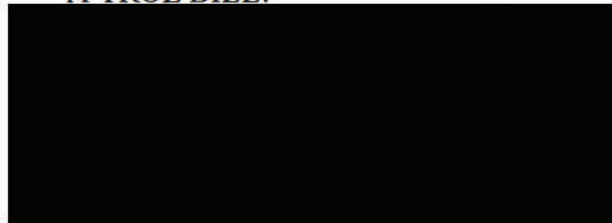
3. If any of the above-described property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;


- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;


the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY


CHRISTOPHER D. USHER II
Assistant United States Attorney
SC Bar No. 101885


K. PAIGE O'HALE
Assistant United States Attorney
LA Bar Roll No. 35943

New Orleans, Louisiana
June 24, 2021